

EXHIBIT C

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**Matt Green**

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**To:** pdmcburney@gmail.com; christine.hwley6855@gmail.com  
**Cc:** 'Elizabeth Hebener Norwood'; Jason Gang  
**Subject:** FW: Re Spartan v. Sullinair et al

Morning Patrick and Christine:

Yesterday I received your Motion for Contempt and Damages.

As you are aware, our Firm was not involved in entry of the New York Judgment in 2022 and as such I've cc'd New York co-counsel Jason Gang on this thread.

Prior to reviewing your Motion, our Firm was unaware that Soleados Estates, LLC had filed for BK (which according to your pleadings, said BK filing occurred on February 27, 2023). It is our understanding that Mr. Gang was also unaware of Soleados Estates' BK filing.

As a result of now being made aware of Soleados Estates' BK filing, our office will immediately file an Amended Notice and Declaration of Foreign Judgment filing here in WA, that states that the NY Judgment that is being domesticated here in WA, is not being enforced against Soleados Estates (the filed pleadings already confirm that the NY Judgment is not being domesticated and enforced against Sullinair Jet Center, LLC; and FBO Partners, LLC).

Also, according to Spartan's and Mr. Gang's records, it was not until December 14, 2022, that he first became aware of both Sullinair Jet Center's and Pasco FBO Partners' respective BK filings. That is why the New York Judgment entered on November 17, 2022, identified Sullinair Jet Center, and Pasco FBO Partners as being judgment debtors in said Judgment. Mr. Gang is in the process of filing with the New York Court an Amended Judgment which removes both Sullinair Jet and Pasco FBO as being named judgment debtors under said Judgment.

Please let me know if you still wish to proceed forward with your Motion? If yes, we will file the necessary paperwork with the Court to explain the above-events.

Thank you and I await your reply.

**Matt Green**

Attorney

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\*\*\* Please note our new mailing address: 2284 W Commodore Way, Suite 300, Seattle, WA 98199\*\*\*